

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar No. 7709

MARCELO ILLARMO (MABN 670079)  
Special Assistant United States Attorney  
Office of the General Counsel  
Social Security Administration  
6401 Security Boulevard  
Baltimore, Maryland 21235  
Telephone: (510) 970-4822  
E-Mail: Marcelo.Illarmo@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KELLY JO GOFORTH,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01792-VCF

UNOPPOSED MOTION FOR VOLUNTARY  
REMAND PURSUANT TO SENTENCE  
FOUR OF 42 U.S.C. § 405(g)

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court remand this action for further administrative action pursuant to section 205(g) of the Social Security Act, as amended, 42 U.S.C. section 405(g), sentence four. The purpose of the remand is to offer Plaintiff a new decision.

On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, conduct any necessary further proceedings and issue a new decision. Defendant further requests that the Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing

1 the final decision of the Commissioner.

2 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
3 motion, on May 4, 2023

4  
5  
6 Dated: May 9, 2023.

7 Respectfully submitted

8 JASON M. FRIERSON  
9 United States Attorney

10 /s/ Marcelo Illarmo  
11 MARCELO ILLARMO  
12 Special Assistant United States Attorney

13 IT IS SO ORDERED:

14   
UNITED STATES MAGISTRATE JUDGE

15 DATED: 5-9-2023  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the foregoing document on the date, and via the method of service, identified below:

**CM/ECF:**

Leonard Stone lstone@shookandstone.com

Marc V Kalagian marc.kalagian@rksslaw.com

Dated May 9, 2023.

/s/ Marcelo Illarmo  
**MARCELO ILLARMO**  
Special Assistant United States Attorney